

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NORTH CAROLINA
NEW BERN DIVISION**

IN RE:

**CASEY FARMS, LLC, *et al.*

DEBTORS.**

**CASE NO: 25-01177-5-PWM
CHAPTER 12**

FIRST MOTION TO EXTEND TIME TO FILE PLANS

COMES NOW Casey Farms, LLC; Christopher Alan Casey (“Christopher”); and William Charles Casey (“William”) (collectively, the “Debtors”), by and through their undersigned counsel of record, and move the Court pursuant to 11 U.S.C. § 1221 for an extension of time within which to file the Chapter 12 Plans of Reorganization in Christopher and William’s individual cases, and in support thereof shows unto the Court as follows:

1. William and Christopher filed their Petitions on March 10, 2025.
2. Casey Farms, LLC, filed its Petition on April 1, 2025.
3. The deadline for William and Christopher to file their Chapter 12 Plan expired on June 8, 2025.
4. The deadline for Casey Farms, LLC, to file its Chapter 12 Plan expires on June 30, 2025.
5. On May 13, 2025, the Court entered its Order directing the joint administration of the three cases.
6. The Debtor requires additional time to prepare the Chapter 12 plans for William and Christopher.
7. No party in interest will be prejudiced by the extension.
8. Good cause exists to extend the due date for the individual Plans and to establish a common due date for the Debtors’ Plans on June 30, 2025.
9. A proposed Order is attached as **Exhibit A**.

WHEREFORE, the Debtors pray the Court for its Order setting a common due date for all three parties to file their Chapter 12 Plans on June 30, 2025, and excusing the failure of the

individual debtors to file their plans by the established due date, and allowing such other and further relief as to the Court seems just and proper.

Respectfully submitted this the 16th day of June, 2025.

NARRON WENZEL, P.A.

By: /s/ David F. Mills

David F. Mills

State Bar No. 18326

P.O. Box 1567

102 S. Third Street

Smithfield, NC 27577

Tele: (919) 934-0049

Fax: (919) 938-1058

dmills@narronwenzel.com

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
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CASEY FARMS, LLC, *et al.*,

**CASE NO: 25-01177-5-PWM
CHAPTER 12**

DEBTORS.

**ORDER EXTENDING TIME TO FILE PLANS AND
ESTABLISHING COMMON DUE DATE**

THIS MATTER comes before the Court upon the Debtors' First Motion for Extension of Time to File Plans; and good cause having been shown;

IT IS ORDERED THAT the due date for filing Chapter 12 Plans for all Debtors in these jointly administered cases is established as June 30, 2025, and the plan deadline for the individual Debtors is extended accordingly; such extension is without prejudice to the Debtor's right to request a further extension.

END OF DOCUMENT.

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CERTIFICATE OF SERVICE

I, David F. Mills, Attorney at Law, P.O. Box 1567, Smithfield, North Carolina 27577, certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the 16th day of June, 2025, I served a copy of the First Motion to Extend Time to File Plans on the following:

VIA CM/ECF

John Bircher
Chapter 12 Trustee

All parties registered to receive service in this case via CM/ECF.

I certify under penalty of perjury that the foregoing is true and correct.

This the 16th day of June, 2025.

NARRON WENZEL, P.A.

By: /s/ David F. Mills

David F. Mills
State Bar No. 18326
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Smithfield, NC 27577
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dmills@narronwenzel.com